

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
GREENVILLE DIVISION**

JESSICA FRYREAR

PLAINTIFF

VS.

CAUSE NO.: 4:22-cv-00112-MPM-DAS

**WASHINGTON COUNTY, MISSISSIPPI,
JARRELL EVANS and CEDRICK ADAMS
in Their Individual Capacities for State Law
Violations Only**

DEFENDANTS

JARRELL EVANS'S MOTION FOR ADDITIONAL TIME

Comes now, Defendant, Jarrell Evans ("Evans"), by and through counsel, and submits this Motion for Additional Time as follows:

1. Plaintiff filed her Complaint in the U.S. District Court, Northern District of, Mississippi, on July 22, 2022, naming Washington, County, Mississippi ("Washington County"), Evans, and Cedrick Adams ("Adams") as defendants. *CM/ECF Doc. No. 1.*
2. Summons was served on Evans on August 10, 2022. *CM/ECF Doc. No. 5.*
3. Prior to the undersigned counsel's retention, on August, 24, 2022, Defendants filed a Motion for Additional Time. *CM/ECF Doc. No. 7.* As a result, the deadline was extended to September 23, 2022.
4. On September 21, 2022, a Motion for Extension of Time was filed by Defendants, Washington County and Adams, but not Evans. *CM/ECF Doc. No. 11.* Subsequently, this Court granted said motion and the deadline for Washington County and Adams to file an answer or other responsible pleading was extended to October 24, 2022. *CM/ECF Doc. No. 12.*

5. Evans deadline to file an answer or other responsible pleading is still September 23, 2022.

6. However, undersigned counsel was only recently retained to represent Evans and Adams and has not yet had an opportunity to review the pleadings, obtain relevant documentation, confer with Evans or Adams, or decide the best course of action for responding to the Plaintiff's lawsuit.

7. Therefore, Evans would respectfully request that this Court extend the responsive pleading deadline in this matter to until October 24, 2022.

8. No party will be prejudiced by granting this extension and this Motion is not being filed for purposes of harassment or delay. Moreover, the requested extension coincides with the current deadline for Washington County and Adams.

9. Plaintiff's counsel has no objection to the requested extension.

10. Because of the simple and self-explanatory nature of this motion, Evans respectfully requests that he be relieved of any obligation to submit a supporting memorandum of authorities.

WHEREFORE, PREMISES CONSIDERED, Defendant, Jarrel Evans, respectfully requests that this Court extend the deadline to file his Answer or other responsive pleading to until October 24, 2022.

DATE: September 23, 2022.

Respectfully submitted,

JARRELL EVANS

By: /s/ Katelyn A. Riley
One of His Attorneys

WILLIAM R. ALLEN (MSB # 100541)
KATELYN A. RILEY (MSB # 105115)
Allen, Allen, Breeland & Allen, PLLC
P. O. Box 751
Brookhaven, MS 39602-0751
Tel. 601-833-4361
Fax 601-833-6647
wallen@aabalegal.com
kriley@aabalegal.com

CERTIFICATE

I, the undersigned of Allen, Allen, Breeland & Allen, PLLC, one of the attorneys for Defendant, Jarrell Evans, hereby certifies that on this day, I electronically filed the foregoing Motion for Additional Time, with the Clerk of the Court using the ECF system which gave notification of the same to the following:

Jim Waide, Esq.
WAIDE & ASSOCIATE, P.A.
P. O. Box 1357
Tupelo, MS 38802-1357
waide@waidelaw.com
Attorney for Plaintiff

Willie Griffin, Esq.
Bailey & Griffin, P.A.
P. O. Box 189
Greenville, MS 38702-0189
wgriffinlawyer@aol.com

Daniel J. Griffith, Esq.
Jacks Griffith Luciano, P.A.
P.O. Box 1209
Cleveland, M S 38732
dgriffith@jlpalaw.com
aluciano@jlpalaw.com

This the 23rd day of September, 2022.

/s/ Katelyn A. Riley
OF COUNSEL